

From: [Harvey, Lornette](#)
To: [Amir Dejbakhsh](#)
Cc: [Chen, Eugene](#); [Rios, Gerardo](#); [Mohsen Nazemi](#); [Israels, Ken](#)
Subject: RE: SCAQMD Title V Program Evaluation: Synthetic Minor Permit Program
Date: Wednesday, June 22, 2016 12:47:00 PM

Amir,

Thank you for speaking to me about the SCAQMD synthetic minor permit program (or non-major source permit program). The following is a summary of our discussions:

- The District's Rule 3008 is used to assist title V sources with applying for a non-major source permit to exit the title V program.
- Some sources don't use Rule 3008, but instead use certain conditions that the District has developed to determine if a source can exit the title V program. The list of conditions was developed a few years ago and include:
 - The source's actual air emission rate is **80% or less** of the major source threshold emission rate (it may be 50% of a major source threshold, you are checking your process and will let us know which one it is);
 - The source has met the actual emission rate of 80% or less of a major source threshold emission rate requirement for **at least 5 years**;
 - The source is not subject to any NESHAP or NSPS regulations;
 - The source submits a compliance plan application that must be approved by SCAQMD's engineers;
 - The source submits administrative applications for each piece of equipment that contributed to its PTE, which classified it as a major title V source; and
 - The synthetic minor sources are inspected every 1 to 2 years to verify they are still operating in compliance with their permit.
- The synthetic minor example permits that EPA received from SCAQMD, as part of the Program Evaluation process, does not meet all the conditions listed.
- By Monday (6/27/16) you will email a copy of the District's procedures/guidelines that is used to reclassify a title V major source to a synthetic minor source (non-major source).

Again, thank you for discussing this issue with me and if you have any questions, or if I have misinterpreted or misunderstood any topics that we discussed, please submit a response to this email or call me at 415-972-3498.

Lornette Harvey
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Harvey.lornette@epa.gov

From: Mohsen Nazemi [mailto:MNazemi1@aqmd.gov]
Sent: Wednesday, June 22, 2016 12:11 AM
To: Harvey, Lornette
Cc: Amir Dejbakhsh
Subject: RE: SCAQMD Title V Program Evaluation: Synthetic Minor Permit Program

Hi Lorenette. I suggest that you speak with Amir first and if there is a need to include me too, Amir will do so. Amir can be reached at (909)396-2618 and I have copied him on this email. Thanks.

Mohsen Nazemi, P.E.
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From: Harvey, Lornette [mailto:Harvey.Lornette@epa.gov]
Sent: Tuesday, June 21, 2016 1:58 PM
To: Mohsen Nazemi <MNazemi1@aqmd.gov>
Subject: SCAQMD Title V Program Evaluation: Synthetic Minor Permit Program

Mohsen,

I need to speak to someone at South Coast regarding the district's synthetic minor permit program. Can you email me a contact name or please call me back (415-972-3498), if it's you. I'll be here today, Wednesday, until 4:30 pm and from 8 am to 4:30 pm tomorrow (Thursday). Thanks.

Lornette Harvey
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